STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502
www.deq.idaho.gov

Governor Brad Little
Director John H. Tippets

July 19, 2019

Angela Sherman, Chief Operating Officer
Maravia Corporation of Idaho
602 E. 45th Street
Boise, ID 83714

RE: Facility ID No. 001-00361, Maravia Corporation of Idaho, Boise
Final Permit Letter

Dear Ms. Sherman:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2019.0009 to Maravia Corporation of Idaho located at 604 E. 45th Street in Boise for an inflatable boat manufacturing facility. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received February 13, 2019.

This permit is effective immediately. This permit does not release Maravia Corporation of Idaho from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Boise Regional Office, 1445 N. Orchard St., Boise, ID 83706, Fax (208) 373-0287.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with David Luft, Air Quality Manager at (208) 373-0201 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Morrie Lewis at (208) 373-0502 or Morrie.Lewis@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\ml
Permit No. P-2019.0009 Project 62183
Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee	Maravia Corporation of Idaho
Permit Number	P-2019.0009
Project ID	62183
Facility ID	001-00361
Facility Location	602 E. 45th Street Boise, ID 83714

Permit Authority

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules), IDAPA 58.01.01.200–228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued July 19, 2019

Morrie Lewis, Permit Writer

Mike Simon, Stationary Source Manager

Contents

1 Permit Scope

Purpose

1.1 This is an initial permit to construct (PTC) for an inflatable boat manufacturing facility.

Regulated Sources

1.2 Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2, 3	Hot-knife cutting operations	Reasonable control of fugitive emissions Cutting operations are conducted within the building.
2, 3	Cleaning operations	Reasonable control of fugitive emissions Cleaning solvents are hand-applied within the building.
2, 3	Gluing operations	Reasonable control of fugitive emissions Glue adhesives are hand-applied within the building.
2, 3	Spray booth and Heater 1 Manufacturer: Dayton or equivalent [a] Model: unknown [a] Burner manufacturer: Mestek Intertek or equivalent [a] Burner model: TF/BTU150 or equivalent [a] Maximum capacity: 150,000 Btu/hr Fuel: natural gas Date of installation: 1998 Maximum operation: as limited by Emission Limits and Operating Requirements	Coatings are spray-applied within the spray booth enclosure. The booth heater is used for seasonal indirect heating of inlet air. Spray booth filter system Particulate filtration method: dry filters Manufacturer: Paint Arrestors [a] Model: RP or equivalent [a] PM Control Efficiency: 90% or greater
	Spray guns Manufacturer: Graco or equivalent [a] Model: 288420 or Silver Tip Plus airless, or equivalent [a] Maximum operation: as limited by Emission Limits and Operating Requirements	Spray guns Type: reduced pressure (RP) or equivalent [a] Transfer Efficiency: 40% or greater

Table 1.1 Regulated Sources

Permit Section	Source		Control Equipment
2, 3	Heater 2		Heaters are used for seasonal indirect heating needs.
	Manufacturer:	Evaporator or equivalent [a]	
	Model:	BVR22 [a]	
	Maximum capacity:	24,000 Btu/hr	
	Fuel:	natural gas	None
	Date of installation:	(unknown)	
	Heater 3		None
	Manufacturer:	Evaporator or equivalent [a]	
	Model:	BVR22 36-CYN18 NTF [a]	
	Maximum capacity:	36,000 Btu/hr	
	Fuel:	natural gas	
	Date of installation:	(unknown)	
	Heater 4 and Heater 5		None
	Manufacturer:	Lennox or equivalent [a]	
	Model:	LF24-250A-5 [a]	
	Maximum capacity:	250,000 Btu/hr each (500,000 Btu/hr combined)	
	Fuel:	natural gas	
	Date of installation:	April 2013	

a) "or equivalent" equipment is equipment which has equivalent or less maximum capacity and equivalent or lower pollutant emission rates, whether calculated based on maximum design capacity or based on established permit limits. Use of replacement equipment shall not result in the emission of any regulated air pollutant not previously emitted, and shall not result in an emission increase as defined in IDAPA 58.01.01.007.

2 Boat Manufacturing and Repair

2.1 Process Description

Maravia Corporation of Idaho operates an inflatable boat manufacturing facility at 602 E. 45th Street in Boise, Idaho. At this facility cutting, cleaning, gluing, and spray coating operations are conducted on polyvinyl chloride (PVC) boat fabrics in the manufacture and repair of inflatable boats. Particulate matter emissions are controlled by the use of spray booth filtration systems. Five natural gas-fired heaters provide indirect heating.

2.2 Control Device Descriptions

Table 2.1 Boat Manufacturing Description

Source Descriptions	Control Equipment
Cutting, cleaning, and gluing operations	Reasonable control of fugitive emissions Cutting operations are conducted within the building. Cleaning solvents and glue adhesives are hand-applied within the building.
Spray guns	Spray booth filter system Particulate filtration method: dry filters Manufacturer: Paint Arrestors [a] Model: RP or equivalent [a] PM Control Efficiency: 90% or greater Spray guns Type: reduced pressure (RP) or equivalent [a] Transfer Efficiency: 40% or greater
Heater 1	None
Heater 2	None
Heater 3	None
Heater 4	None
Heater 5	None

a) "or equivalent" equipment is equipment which has equivalent or less maximum capacity and equivalent or lower pollutant emission rates, whether calculated based on maximum design capacity or based on established permit limits. Use of replacement equipment shall not result in the emission of any regulated air pollutant not previously emitted and shall not result in an emission increase as defined in IDAPA 58.01.01.007.

Emission Limits

2.3 Annual Emission Limits

Emissions from cleaning, gluing, and spray coating operations shall not exceed the emission rate limits in Table 2.2. Operations include spray- or hand-application of adhesive and coating materials.

Table 2.2 Cleaning, Gluing, And Spray Coating Operation Annual Emission Limits [a]

Source Description	$PM_{10}/PM_{2.5}$ [b]	VOC [c]	Total HAP [d]
	T/yr [e]	T/yr [e]	T/yr [e]
Cleaning, Gluing, And Spray Coating Operation emissions	0.54	18.70	3.20

a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and recordkeeping requirements.

b) Particulate matter (PM) including condensable PM as defined in IDAPA 58.01.01.006, with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers for $PM_{2.5}$, and less than or equal to a nominal 10 micrometers for PM_{10}.

c) Volatile organic compounds (VOC).

d) Emission limit for the combined total of all hazardous air pollutants (combined).

e) Tons of emissions per each consecutive 365-day period.

2.4 Odors

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids into the atmosphere of such nature and duration and under such conditions as would be injurious to human health or welfare, to animal or plant life, or to property, or to interfere unreasonably with the enjoyment of life or property in accordance with IDAPA 58.01.01.776.

2.5 Fuel-Burning Equipment Emission Limits

The permittee shall not discharge to the atmosphere from any natural gas-fired heater (Heater 1, Heater 2, Heater 3, Heater 4, and Heater 5) particulate matter (PM) in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, in accordance with IDAPA 58.01.01.675-681.

2.6 Opacity Limit

Emissions from the spray booth stack, each heater stack (Heater 1, Heater 2, Heater 3, Heater 4, and Heater 5), and any other stack, vent, or functionally equivalent opening associated with these units shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

2.7 Spray Guns and Spray Booth Filter System

The permittee shall maintain and operate the spray guns, spray booth, and spray booth filter system and in accordance with manufacturer's specifications. The spray booth filter system shall be operated at all times when the spray booth is operating. Any period of time that the spray booth is in operation while the spray booth filter system is not in operation shall be treated as an excess emission event, and the permittee shall comply with excess emission procedures and requirements included in the General Provisions of this permit.

- The permittee shall install, maintain, and operate according to the manufacturer's specifications and recommendations, a spray booth filter system with a minimum control efficiency of 90% for particulate emissions as documented by the filter manufacturer.
- Spray application of all adhesive and coating materials shall be conducted inside the spray booth with filters in place, exhaust fan operating, and doors and curtains closed.
- Spray application of all adhesive and coating materials shall be conducted with reduced pressure or equivalent spray guns (Table 2.1), with a minimum 40% transfer efficiency as documented by the spray gun manufacturer.

2.8 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne, in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, consideration will be given to factors such as the proximity of dust emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:

- All solvent cleaning, hot-knife cutting, and gluing operations shall be conducted inside the building.
- Hoods, fans, and fabric filters or equivalent systems shall be installed and used to enclose and vent materials, where practical.

2.9 Approved Daily Adhesive and Coating Material Usage Limits

Unless the permittee is complying with an Alternate Daily Adhesive and Coating Material Usage Scenario which demonstrates compliance with Screening Emission Rates, the permittee shall comply with the Daily Adhesive and Coating Material Usage Limits in Table 2.3.

Table 2.3 Approved Daily Adhesive and Coating Material Usage Scenario

Adhesive and Coating Materials	Daily Adhesive and Coating Material Usage Limit (gal/day) [a]
Catur Catalyst	0.09
LA4009	8.70
Techthane 90SS-MB Part A	30.0
Techthane 90SS-MB Part B	30.0
Methyl Ethyl Ketone (MEK)	43.2

a) Gallons per calendar day

2.10 Approved Annual Adhesive and Coating Material Usage Limits

The permittee shall not exceed the annual Adhesive and Coating Material Usage limits in Table 2.4.

Table 2.4 Annual Adhesive and Coating Material Usage Limits

Adhesive and Coating Materials	Annual Adhesive and Coating Material Usage Limit (gal/yr) [a]
Catur Catalyst	29.0
LA4009	1,755
Techthane 90SS-MB Part A	1,479
Techthane 90SS-MB Part B	1,479
Methyl Ethyl Ketone (MEK)	2,074
Pigments [b]	86.0

a) Gallons per rolling consecutive 12-month period.

b) For this permit condition, pigments include Black, Emerald/Rib Green, Forest Green, Golden, Gray N1, Kiwi (Green LMG-04), Light Blue Mar 1, Lime Green, Magenta, Medium Blue, Olive Drab, Orange, Purple, Red C-13, Royal Blue Mar Blue 12, Teal, White C-08, and Yellow.

Alternate Daily Adhesive and Coating Material Usage Scenarios (If Applicable)

Unless using an Approved Daily Adhesive and Coating Material Usage Scenario for which compliance has previously been determined (Permit Conditions 2.9 and 2.10), such as when new or reformulated adhesives or coating materials are introduced, each day before adhesive or coating materials are used the permittee shall follow the procedures of this section. The permittee shall not use any new Daily Adhesive and Coating Material Usage Scenario until Adhesive and Coating Material TAP compliance and Annual Emission Limits compliance have been demonstrated for that Scenario according to the following permit conditions.

2.11 Propose a Daily Adhesive and Coating Material Usage Scenario

Prior to using or implementing a new Daily Adhesive and Coating Material Usage Scenario:

- The permittee shall propose and record maximum daily adhesive and coating material usage limits for each adhesive and coating material that will be used in the Scenario, in gallons per day (gal/day). The permittee shall not use or implement any Scenario that does not have recorded maximum daily adhesive and coating material usage limits.
- The permittee shall estimate emissions of $PM_{10}/PM_{2.5}$, VOC, total HAP, and all TAP listed in Table 2.5 for the Scenario (lb/day for each pollutant), using the procedures described below for estimating emissions.
- The permittee shall demonstrate adhesive and coating material TAP compliance for the Scenario, using the procedures described below for demonstrating adhesive and coating material TAP compliance. The permittee shall not use or implement any Scenario that does not demonstrate adhesive and coating material TAP compliance.
- The permittee shall demonstrate Annual Emission Limits compliance for the Scenario, using the procedures described below for demonstrating Annual Emission Limits compliance. The permittee shall not use or implement any Scenario that does not demonstrate Annual Emission Limits compliance.

- The daily adhesive and coating material usage limits and emission estimates used in determining TAP compliance and Annual Emission Limits compliance shall be based on estimated emissions from all adhesive and coating materials to be used from all operations at the facility (i.e., facility-wide).

2.12 Estimate Adhesive and Coating Material TAP Emissions

TAP emissions shall be estimated for all TAP listed in Table 2.5:

- Emissions shall be estimated by multiplying each maximum daily adhesive and coating material usage rate (gal/day) by the TAP content (lb/gal) of that material, and summing the total emissions from all adhesive and coating materials (lb/day). TAP emissions which are designated as a particulate in Table 2.5 may also be multiplied by one minus the documented spray gun transfer efficiency and by one minus the documented filtration system control efficiency when control equipment will be applied to such emissions. Alternatively, for isocyanate-based "iso" materials such as those used in 2-part urethane systems containing MDI, isocyanate-based TAP emissions may instead be multiplied by one minus the documented spray gun transfer efficiency and by 15% to account for the isocyanate reaction.
- TAP content (lb/gal) of a coating is specified on the Safety Data Sheet (SDS) for that coating, or shall be calculated by multiplying the weight percentage of TAP (%) by the density (lb/gal) of the coating from the SDS.
- For TAP content, if a range is presented on the SDS for a coating, the highest value of the range shall be used when estimating emissions.
- When the TAP content is listed as below detection on SDS or other documentation, the TAP content shall be assumed equal to the coating density divided by 100 (i.e., 1% of density in lb/gal) when estimating emissions.
- When the TAP content cannot be determined from SDS or other documentation, the TAP content shall be assumed equal to the density of the coating (lb/gal) when estimating emissions.

2.13 Demonstrate Adhesive and Coating Material TAP Compliance

For each Daily Adhesive and Coating Material Usage Scenario, the permittee shall estimate TAP emissions from all adhesive and coating material operations and compare against the TAP Screening Emission Rates in Table 2.5:

- The permittee shall compare estimated TAP emissions for all coatings against the Screening Emission Rates in Table 2.5.

Table 2.5 TAP Screening Emission Rates

TAP	CAS	Particulate?	HAP?	Screening Emission Rate (lb/day) [a]
Acetone	67-64-1	No	No	2856
Acetaldehyde	75-07-0	No	Yes	0.072
Acrylamide	79-06-1	No	Yes	0.0001224
Acrylic Acid	79-10-7	No	Yes	48
Aluminum - Metal and Oxide	7429-90-5	Yes	No	16.008
Aluminum - Soluble Salts	7429-90-5	Yes	No	3.192
n-Amyl Acetate	628-63-7	No	No	847.2
Antimony	7440-36-0	Yes	Yes	0.792
Barium	7440-39-3	Yes	No	0.792
Benzene	71-43-2	No	Yes	0.0192
Benzo(a)pyrene	50-32-8	No	Yes	0.000048
Benzoyl Peroxide	94-36-0	No	No	7.992
Bis (2-Ethylhexyl) Phthalate (DEHP)	117-81-7	No	Yes	0.672
2-Butoxyethanol (EGBE; Ethylene Glycol Monobutyl Ether)	111-76-2	No	No	192
2-Butoxyethyl Acetate	112-07-2	No	Yes	199.92
n-Butyl Acetate	123-86-4	No	No	1135.2
tert-Butyl Acetate	540-88-5	No	No	1519.2
n-Butyl Alcohol	71-36-3	No	No	240
Sec-Butyl Alcohol (2-Butanol)	78-92-2	No	No	487.2
Butyl Hydroxytoluene (2,6-Di-tert-butyl-p-cresol)	128-37-0	No	No	16.008
Calcium Carbonate (Limestone)	1317-65-3	Yes	No	16.008
Calcium Sulfate (Gypsum)	13397-24-5	Yes	No	16.008
Carbon Black	1333-86-4	Yes	No	5.52
Carbon Tetrachloride	56-23-5	No	Yes	0.01056
Chloroform	67-66-3	No	Yes	0.00672
Chromium	7440-47-3, 16065-83-1	Yes	Yes	0.792
Chromium (VI)	18540-29-9	Yes	Yes	0.00001344
Cobalt	7440-48-4	Yes	Yes	0.0792
Copper	7440-50-8	Yes	No	1.608
Cumene	98-82-8	No	Yes	391.2
Cyclohexane	110-82-7	No	No	1680
Cyclohexanone	108-94-1	No	No	160.08
Diacetone Alcohol	123-42-2	No	No	384
Dibutyl Phthalate (DBP)	84-74-2	No	Yes	7.992
1,4-Dichlorobenzene	106-46-7	No	Yes	720
o-Dichlorobenzene	95-50-1	No	No	480
Diethyl Phthalate	84-66-2	No	No	7.992
Diisobutyl Ketone	108-83-8	No	No	232.08
Dimethylphthalate (DMP)	131-11-3	No	Yes	7.992
Diphenyl (Biphenyl)	92-52-4	No	Yes	2.4
Dipropylene Glycol Methyl Ether	34590-94-8	No	No	960
Ethanolamine (2-Aminoethanol; Monoethanolamine)	141-43-5	No	No	12.792
Ethyl Acetate	141-78-6	No	No	2239.2
Ethyl Alcohol	64-17-5	No	No	3000
Ethyl Benzene	100-41-4	No	Yes	696
Ethylene Glycol	107-21-1	No	Yes	20.304
Ethylenediamine (1,2-Diaminoethane)	107-15-3	No	No	40.08
Formaldehyde	50-00-0	No	Yes	0.01224
Furfuryl Alcohol	98-00-0	No	No	64.08
H12MDI [b][c]	5124-30-1	No	No	1.91
Heptane (n-Heptane)	142-82-5	No	No	2616

Table 2.5 TAP Screening Emission Rates

Hexamethylene Diisocyanate [c]	822-06-0	No	Yes	0.048
Hexane (n-Hexane)	110-54-3	No	Yes	288
Hydroquinone	123-31-9	No	Yes	3.192
Iron Oxide (Fe_2O_3)	1309-37-1	Yes	No	7.992
Isobutyl Acetate	110-19-0	No	No	1120.8
Isobutyl Alcohol	78-83-1	No	No	240
Isophorone Diisocyanate	4098-71-9	No	No	0.144
Isopropyl Alcohol (Isopropanol)	67-63-0	No	No	1567.2
Isopropyl Acetate	108-21-4	No	No	1663.2
Kaolin	1332-58-7	Yes	No	3.192
Lead	7439-92-1	Yes	Yes	0.328
Manganese	7439-96-5	Yes	Yes	7.992
Magnesite (Magnesium Carbonate)	546-93-0	Yes	No	16.008
Methacrylic Acid	79-41-4	No	No	112.08
Methanol	67-56-1	No	Yes	415.2
1-Methoxy-2-Propanol Acetate (PGMEA)	108-65-6	No	No	576
2-Methoxyethyl Acetate (EGMEA; Ethylene Glycol Monomethyl Ether Acetate)	110-49-6	No	Yes	38.4
Methyl Acetate	79-20-9	No	No	976.8
Methyl n-Amyl Ketone (Heptan-2-one)	110-43-0	No	No	376.8
Methyl Chloroform	71-55-6	No	Yes	3048
Methyl Ethyl Ketone (MEK)	78-93-3	No	No	943.2
Methyl Isoamyl Ketone	110-12-3	No	No	384
Methyl Isobutyl Carbinol	108-11-2	No	No	166.32
Methyl Isobutyl Ketone (MIBK)	108-10-1	No	Yes	328.8
Methyl Methacrylate	80-62-6	No	Yes	655.2
o-Methylcyclohexanone	583-60-8	No	No	367.2
Methylene Chloride (Dichloromethane)	75-09-2	No	Yes	0.0384
Methylene Diisocyanate (MDI; 4,4'-Diphenylmethane Diisocyanate) [c]	101-68-8	No	Yes	0.072
Methyl Propyl Ketone (2-Pentanone)	107-87-9	No	No	1120.8
Mica	12001-26-2	Yes	No	4.8
Molybdenum	7439-98-7	Yes	No	7.992
Naphthalene	91-20-3	No	Yes	79.92
Nickel	7440-02-0	Yes	Yes	0.000648
Nonane	111-84-2	No	No	1680
Pentane	109-66-0	No	No	2832
Phenol	108-95-2	No	Yes	30.48
Phosphoric Acid	7664-38-2	No	No	1.608
Portland Cement	65997-15-1	Yes	No	16.008
Propionic Acid	79-09-4	No	No	48
n-Propyl Acetate	109-60-4	No	No	1344
Propyl Alcohol	71-23-8	No	No	799.2
Selenium	7782-49-2	Yes	Yes	0.312
Silica – Amorphous, including: • Diatomaceous Earth (uncalcined) • Precipitated Silica • Silica Gel	61790-53-2 112926-00-8	Yes	No	16.008
Silica - Crystalline - Cristobalite	14464-46-1	Yes	No	0.0792
Silica - Crystalline Quartz & Fused Silica	14808-60-7	Yes	No	0.1608
Sodium Hydroxide (Caustic Soda)	1310-73-2	No	No	3.192
Stoddard Solvent	8052-41-3	No	No	840
Styrene	100-42-5	No	Yes	160.08
Tetrachloroethylene (PCE; Perchloroethylene)	127-18-4	No	Yes	0.312
Tetrahydrofuran	109-99-9	No	No	943.2
Toluene	108-88-3	No	Yes	600
Trichloroethylene (TCE)	79-01-6	No	Yes	0.01224

Table 2.5 TAP Screening Emission Rates

Triethylamine	121-44-8	No	Yes	6.48
Trimethyl Benzene (Mixed and Individual Isomers)	25551-13-7	No	No	196.8
2,2,4-Trimethylpentane	540-84-1	No	Yes	559.2
Vinyl Acetate	108-05-4	No	Yes	55.2
Vinyl Chloride	75-01-4	No	Yes	0.02256
VM&P Naphtha (Petroleum Ether; Ligroin)	8032-32-4	No	No	2191.2
Xylene (o-, m-, p-isomers)	1330-20-7	No	Yes	696
Zinc	7440-66-6	Yes	No	16.008
Zinc Oxide	1314-13-2	Yes	No	16.008
Zirconium	7440-67-7	Yes	No	7.992

a) Worst-case pounds of emissions from all coating operations (combined) per day, as calculated using procedures in this permit to estimate TAP emissions, or as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference method, or DEQ-approved alternative.

b) Dicyclohexylmethane 4,4'-Diisocyanate (H12MDI), regulated as methylene bis (4-cyclohexyl isocyanate). The screening emission rate was developed based upon the results of modeling analyses.

c) Isocyanate-based TAP for the purposes of Permit Condition 2.12.

2.14 Demonstrate Emission Limits Compliance

For each Daily Adhesive and Coating Material Usage Scenario, the permittee shall estimate emissions from all adhesive and coating material operations and compare against the Emission Limits in Table 2.2:

- Daily $PM_{10}/PM_{2.5}$ emissions shall be estimated by multiplying each coating maximum daily coating usage rate (gal/day) by the solids content (lb/gal) of that coating, and summing the total emissions from all coatings (lb/day). Emissions may also be multiplied by one minus the transfer efficiency and by one minus the filter control efficiency when control equipment will be applied to such emissions. Emissions from isocyanate-based "iso" coating materials (Table 2.5) used in 2-part urethane systems may be multiplied by 15% to account for material applied, consumed in the reaction, and captured by filtration.
- Daily VOC emissions shall be estimated by multiplying each coating maximum daily coating usage rate (gal/day) by the VOC content (lb/gal) for that coating material, and summing the total emissions from all coating materials (lb/day).
- Daily HAP emissions shall be estimated by multiplying each coating maximum daily coating usage rate (gal/day) by the HAP content (lb/gal) for each coating material, and summing the total emissions from all coating materials (lb/day).
- Annual $PM_{10}/PM_{2.5}$, VOC, and total HAP emissions shall be determined by summing daily emissions (lb/day) over the previous consecutive 365-day period and dividing by 2000 pounds per ton (lb/T).
- For solids content, VOC content, and HAP content, if a range is presented on the SDS for a coating, the highest value of the range shall be used when estimating emissions.
- When the solids content, VOC content, or HAP content is listed as below detection on SDS or other documentation, the content shall be assumed equal to the coating density divided by 100 (i.e., 1% of density in lb/gal) when estimating emissions.
- When the solids content, VOC content, or HAP content cannot be determined from SDS or other documentation, the content shall be assumed equal to the density of the coating (lb/gal) when estimating emissions.
- The permittee shall compare estimated emissions (T/yr) for all coating materials against the Emission Limits in Table 2.2. The permittee shall not use or implement any Scenario that exceeds an Emission Limit.

Monitoring, Recordkeeping, and Reporting Requirements

2.15 Odor Complaints

The permittee shall maintain records of all odor complaints received to demonstrate compliance with the Odors limit. The permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

2.16 Daily Adhesive and Coating Material Usage

Each calendar day on which adhesive and coating materials are used, the permittee shall collect and maintain records of the quantity of each material used, including but not limited to thinners, solvents, and adhesives to demonstrate compliance with Approved Daily Adhesive and Coating Material Usage Limits and Alternate Daily Adhesive and Coating Material Usage Scenario requirements.

- If no Alternate Daily Adhesive and Coating Material Usage Scenarios were used in the calendar day, the daily and annual usage rates shall be compared against the Approved Daily Adhesive and Coating Material Usage Limits.
- If Alternate Daily Adhesive and Coating Material Usage Scenarios were used in the calendar day, emissions from all adhesive and coating materials shall be summed and compared against TAP screening emission rates using the estimation procedures provided in the Estimate Adhesive and Coating Material TAP Emissions, and compared against Emission Limits using the estimation procedures provided in the Demonstrate Emission Limits Compliance permit condition.
- Exceedances of Approved Annual Adhesive and Coating Material Usage Limits and Annual Emission Limits shall be treated as excess emission event(s), and the permittee shall report these in accordance with the excess emission procedures and requirements provided in the General Provisions of this permit.

2.17 Alternate Daily Adhesive and Coating Material Usage Scenarios

Each calendar day on which an alternate adhesive and coating material usage scenario will be used, the permittee shall select and record the Daily Adhesive and Coating Material Usage Scenario that will be used for that day, and comply with the maximum daily coating usage limits specified for the selected Scenario.

- Only one Scenario may be used each calendar day.
- The permittee shall not exceed any daily coating usage limit for the Scenario chosen for that calendar day.
- The permittee shall maintain documentation such as coating material SDS, manufacturer's specification sheets that support filter control efficiencies, transfer efficiencies, capture efficiencies, and other engineering assumptions relied upon in emission calculations.

2.18 Adhesive and Coating Material Purchases and Safety Data Sheets

For each adhesive and coating material used at the facility, including but not limited to thinners, solvents, and adhesives, the permittee shall record and maintain the following records:

- Material purchase records
- Safety Data Sheets (SDS)

2.19 Alternate Adhesive and Coating Material Usage Scenario Reporting

Each year, for Scenarios that have not already been approved, the permittee shall submit a report by May 1st on all unapproved Adhesive and Coating Material Usage Scenarios used each calendar day during the previous 365-day period. The report shall include documentation supporting the TAP compliance demonstrations and the Emission Limits compliance demonstrations relied upon for each Adhesive and Coating Material Usage Scenario. Documentation should be in sufficient detail, including documentation of all calculations, such that DEQ can verify the analysis. The report shall be titled "Permit-Required TAP Compliance Report" and shall be sent to:

DEQ State Office
Air Quality Division
1410 N. Hilton
Boise, ID 83706

3 General Provisions

General Compliance

3.1 The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the "Rules for the Control of Air Pollution in Idaho." The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the "Rules for the Control of Air Pollution in Idaho," and the Environmental Protection and Health Act (Idaho Code §39-101, et seq).

[Idaho Code §39-101, et seq.]

3.2 The permittee shall at all times (except as provided in the "Rules for the Control of Air Pollution in Idaho") maintain in good working order and operate as efficiently as practicable all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/94]

3.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

3.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee's premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

3.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/94]

3.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
- A notification of the date of any suspension of construction, if such suspension lasts for one year or more; and

- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.01, 5/1/94]

- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

3.7 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

3.8 All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

3.9 Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00 and 4/11/15]

Monitoring and Recordkeeping

3.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

Excess Emissions

3.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

3.12 All documents submitted to DEQ—including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification—shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

3.13 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

3.14 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

3.15 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

3.16 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.211, 5/1/94]